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6 Attorney for Plaintiff
United States of America

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8 IN THE UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 CARLOS GARCIA WELDON, SANDRA
JUDITH CASTANEDA CISNEROS, EDEL
15 FELIX CASTRO, AND FERMIN LOZANO
GONZALEZ,

16 Defendant.

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CASE NO. 1:19-CR-00274 NONE-SKO

18 STIPULATION AND ORDER BETWEEN THE
UNITED STATES AND DEFENDANTS AMANDA
JOY NASH

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20 **STIPULATION**

21 WHEREAS, the discovery in this case is voluminous and contains personal information
including but not limited to personal identification numbers, dates of birth, financial account numbers,
telephone numbers, and residential addresses (“Protected Information”); and

22 WHEREAS, the parties desire to avoid both the necessity of large scale redactions and the
unauthorized disclosure or dissemination of Protected Information to anyone not a party to the court
proceedings in this matter;

23 The parties agree that entry of a stipulated protective order is appropriate.

24 THEREFORE, defendants, by and through their counsel of record (“Defense Counsel”), and
plaintiff, the United States of America, by and through its counsel of record, hereby agree and stipulate
as follows:

1 1. This Court may enter protective orders pursuant to Rule 16(d) of the Federal Rules of
2 Criminal Procedure, and its general supervisory authority.

3 2. This Order pertains to all discovery provided to or made available to Defense Counsel as
4 part of the discovery in this case (hereafter, collectively known as the “discovery”).

5 3. By signing this Stipulation and Protective Order, Defense Counsel agrees not to share any
6 documents that contain Protected Information with anyone other than Defense Counsel and designated
7 defense investigators and support staff. Defense Counsel may permit the defendant to view un-redacted
8 documents in the presence of Defense Counsel or under the supervision of Defense Counsel. The parties
9 agree that Defense Counsel, defense investigators, and support staff shall not allow the defendant to
10 copy Protected Information contained in the discovery. The parties agree that Defense Counsel, defense
11 investigators, and support staff may provide the defendant with copies of documents from which
12 Protected Information has been redacted.

13 4. The discovery and information therein may be used only in connection with the litigation
14 of this case and for no other purpose. The discovery is now and will forever remain the property of the
15 United States Government. Defense Counsel will return the discovery to the Government or certify that
16 it has been destroyed at the conclusion of the case.

17 5. Defense Counsel will store the discovery in a secure place and will use reasonable care to
18 ensure that it is not disclosed to third persons in violation of this agreement.

19 6. Defense Counsel shall be responsible for advising the defendants, employees, other
20 members of the defense team, and defense witnesses of the contents of this Stipulation and Order.

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1 7. In the event that the defendant substitutes counsel, undersigned Defense Counsel agrees
2 to withhold discovery from new counsel unless and until substituted counsel agrees also to be bound by
3 this Order or the Court modifies this Order regarding such transfer of discovery.

4 IT IS SO STIPULATED.

5 Dated: February 5, 2020

McGREGOR W. SCOTT
United States Attorney

7 _____
8 /s/ *Melanie L. Alsworth*
MELANIE L. ALSWORTH
Assistant United States Attorney

9 Dated: February 5, 2020

10 _____
11 /s/ *Preciliano Martinez*
PRECILIANO MARTINEZ
Counsel for Defendant Weldon

12 Dated: February 10, 2020

13 _____
14 /s/ *Mark Coleman*
MARK COLEMAN
Counsel for Defendant Cisneros

15 Dated: February 5, 2020

16 _____
17 /s/ *Arturo Hernandez*
ARTURO HERNANDEZ
Counsel for Defendant Castro

18 Dated: February 6, 2020

19 _____
20 /s/ *Roger Bonakdar*
ROGER BONAKDAR
Counsel for Defendant Lozano

21 **ORDER**

22 IT IS SO ORDERED.

23 Dated: February 10, 2020

24 _____
25 *Dale A. Drayd*
26 _____
27 UNITED STATES DISTRICT JUDGE